

71581-6

2/25/2004

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

February 25, 2004

Gail Early  
Regulatory Specialist  
ISK Biocides, Inc.  
416 E. Brooks Road  
Memphis, TN 38109

Subject: Premier  
EPA Registration No. 71581-6  
Application Date: January 28, 2004  
EPA Received Date: February 2, 2004

Dear Ms. Early:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA 3(c)9.

**Proposed Notification**

- Addition of Skin Sensitizer Phrase

**General Comments**

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable. A copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,

Adam Heyward  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510 C)

**CONCURRENCES**

SYMBOL								
SURNAME								
DATE								

2 8 9

## ISK Biocides, Inc.

January 28, 2004

Mr. Adam Heyward, Team Leader (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510W)  
U.S. Environmental Protection Agency  
Crystal Mall #2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Re: Premier (EPA Reg. No. 71581-6))  
Notification of Addition of Sensitizer Statement

Dear Mr. Heyward:

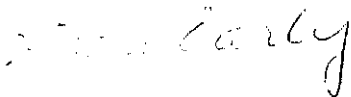
The purpose of this submission is to notify the agency of the addition of a phrase to the Precautionary Statements for the above product. Test results from our acute tox package showed that Premier is a sensitizer, thus the label must carry the phrase, "**Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals**". This statement was left off of the original approved label. This notification will correct that error.

We have a label amendment in the EPA review system that includes the addition of this phrase, but the State of California is currently in the process of reviewing this product for registration and requires this addition before they will grant registration. So, I am sending it as a separate notification.

Enclosed is one copy of the label with this change indicated for your files.

If you have questions or need additional information, I can be reached at 901-344-5316 or [earlyg@ibio.com](mailto:earlyg@ibio.com).

Sincerely,



Gail Early  
Registrations Representative

Enclosures



Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95

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United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number 71581-6	2. EPA Product Manager Heyward	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Premier	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) ISK Biocides, Inc. 416 E. Brooks Rd. Memphis, TN 38109 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification to add the phrase, "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals". This notification is consistent with the provisions of PR Notice 95-2 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Gail Early	Title Regulatory Specialist	Telephone No. (Include Area Code) 901-344-5316
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Gail Early</i>	3. Title Regulatory Specialist	
4. Typed Name Gail Early	5. Date <i>Jan 28, 2004</i>	

# PREMIER™

## SAPSTAIN / MOLD CONTROL For Fresh Cut Lumber & Wood Products

Effective on softwoods, including Douglas fir, white fir, spruce, hemlock and pines (including southern and western yellow pines & eastern and western white pines) and many hardwoods, including oak, poplar and maple.

**NOTIFICATION**  
Date Reviewed: \_\_\_\_\_  
Reviewed By: \_\_\_\_\_

### INGREDIENT STATEMENT

#### ACTIVE INGREDIENTS:

3-Iodo-2-Propynyl Butyl Carbamate .....	6.0%
Propiconazole:1-[[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl]-1H-1,2,4-triazole .....	3.0%

OTHER INGREDIENTS: ..... 91.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

### CAUTION

See back panel for additional precautionary statements.

Manufactured for:

ISK Biocides, Inc.  
416 East Brooks Road  
Memphis, TN 38109

EPA Reg. No. 71581-6

EPA Est. No. 1022-TN-1

Net Contents: \_\_\_\_\_

Batch No.: \_\_\_\_\_

Printed in USA

## **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not use water collected from treated wood for potable water.

Premier is a liquid concentrate of 3-Iodo-2-Propynyl Butyl Carbamate (IPBC) and 1-[[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl]-1H-1,2,4-triazole (Propiconazole) which readily mixes with various diluents to form a preservative solution.

Wood products for use in particle board and veneer production processes may be protected from sapstain and mold by the same treating processes recommended for freshly cut lumber and timber.

**FOR STAIN AND MOLD CONTROL ON FRESHLY CUT LUMBER, TIMBERS, AND PEELED LOGS:** Freshly cut wood should be treated within 24 hours. Otherwise, fungal attack may extend below the surface of the wood beyond the reach of a surface fungicide treatment. Freshly treated lumber should be protected from rain.

The longer the time between falling the log and sawn lumber production, the greater the incidence of pre-infection and the lower the level of stain and mold control will be achieved. This is particularly true of lumber from susceptible tree species such as pine, fir, hemlock, and yellow poplar.

### **Dip Tank and Across-the-Chain Applications:**

The most cost effective strength of a Tuff Brite II solution will depend on the environment, the lumber treated, and the duration of control required.

Under **mild** stain and mold conditions, dilutions of 1 gallon of Tuff Brite II to 150 – 200 gallons of dip vat solution are recommended.

Under **moderate** stain and mold conditions, dilutions of 1 gallon of Premier with 100 to 125 gallons of dip vat solution are recommended.

Under **severe** stain and mold conditions, a dilution of 1 gallon of Premier to 50 to 75 gallons of dip vat solution are recommended.

### **Low Volume Spray Application:**

For individual boards which are treated in low volume spray machines, add 1 gallon of Premier to 15 – 50 gallons of water. Smooth surfaced lumber normally retains only about one-half as much fungicide solution as rough cut wood and, therefore, needs the higher rate to deposit the necessary amount of fungicide on the wood.

(Directions for Use Continued)

Addition of a corrosion inhibitor is not required with Premier, as the formulation contains a built-in corrosion-inhibiting system.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION**

Harmful if inhaled. Avoid breathing vapor or spray mist. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. ~~Prolonged or~~ frequently repeated skin contact may cause allergic reactions in some individuals

\*

Personal Protective Equipment (PPE):

Applicators and other handlers must wear:

- Coveralls worn over long sleeved shirt and long pants
- Chemical resistant footwear plus socks
- Goggles or face shield
- Chemical resistant gloves (such as: barrier laminate, butyl rubber, neoprene rubber, nitrile rubber, polyvinyl chloride (PVC) and viton)

For Cleaning Equipment:

- Chemical-resistant apron

User Safety Requirements:

Follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:

- Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- User should remove personal protective equipment immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish. DO NOT discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. DO NOT discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

**PHYSICAL OR CHEMICAL HAZARDS**

Combustible. Do not use near heat or open flame.

**STORAGE & DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**FIRST AID****IF IN EYES**

- Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

**IF INHALED**

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

In case of emergency call Chemtrec at 1-800-424-9300.

Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.

## WARRANTY AND LIMITATION OF DAMAGES

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller that this product conformed to its chemical description and was reasonably fit for the purposes stated on the label when used in accordance with Seller's directions under normal conditions of use and Buyers and users of this product assume the risk of any use contrary to such directions. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.

Buyers and users of this product are responsible for all loss or damage from use or handling of this product which results from conditions beyond the control of Seller, including, but not limited to, incompatibility with other products unless otherwise expressly provided in the Directions for Use of this product, weather conditions, moisture conditions or other environmental conditions outside the ranges that are generally recognized as being conducive to good industrial and/or application practices.



# TRANSMITTAL DOCUMENT

## NOTIFICATION

FOR

Premier

(EPA Registration No. 71581-6)

January 28, 2004

Company Official:

Gail Early  
Name

*Gail Early*  
Signature

Company Name:

ISK Biocides, Inc.  
416 East Brooks Road  
Memphis, TN 38109

Company Contact:

Gail Early  
Name

901/344-5316  
Phone

